

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JANE DOE,

Plaintiff,

V.

EDINBURG CONSOLIDATED
INDEPENDENT SCHOOL DISTRICT,

Defendant.

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CA NO. 7:19-CV-00309

PLAINTIFF'S INITIAL RULE 26 DISCLOSURES

I. INITIAL DISCLOSURES.

A. Individuals with Discoverable Information

1. The names, addresses (work and home), and telephone numbers (work and home) of individuals likely to have discoverable information that Plaintiff may use to support her claims are:

**Jane Doe
c/o The Buzbee Law Firm
600 Travis Street, Suite 7300
Houston, Texas 77002
(713) 223-5393**

Plaintiff.

**Edinburg Consolidated Independent School District
c/o Esparza & Garza, L.L.P.
964 E. Los Ebanos
Brownsville, Texas 78520
(956) 547-7775**

Defendant.

Francisco Coronado Badillo

Former Edinburg CISD teacher who sexually assaulted Jane Doe.

1 **Mary Ann Badillo**

2 *Sister of Francisco Coronado Badillo.*

3 **Elizabeth Garcia**

4 *Mother of Plaintiff.*

5 **Jessica Badillo**

6 *Ex-wife of Francisco Coronado Badillo.*

7 **Hope Palacios**
8 **c/o Hidalgo County District Attorney's Office**
9 **100 E. Cano**
10 **Edinburg, Texas 78539**
11 **(956) 292-7600**

12 *Prosecutor for criminal case against Francisco Coronado Badillo.*

13 **René Gutiérrez**

14 *Former Superintendent of Edinburg CISD.*

15 **Francisco Lumbreras**
16 **c/o Esparza & Garza, L.L.P.**
17 **964 E. Los Ebanos**
18 **Brownsville, Texas 78520**
19 **(956) 547-7775**

20 *Assistant principal of Robert Vela High School at the time of the incident(s).*

21 **Sylvia Ledesma**
22 **c/o Esparza & Garza, L.L.P.**
23 **964 E. Los Ebanos**
24 **Brownsville, Texas 78520**
25 **(956) 547-7775**

26 *Principal of Robert Vela High School at the time of the incident(s).*

27 **Alyssa Ramirez**
28 **c/o Esparza & Garza, L.L.P.**
964 E. Los Ebanos
Brownsville, Texas 78520
(956) 547-7775

1 *Jane Doe's teacher at Robert Vela High School.*

2 **Noemi Vela**
3 **c/o Esparza & Garza, L.L.P.**
4 **964 E. Los Ebanos**
5 **Brownsville, Texas 78520**
6 **(956) 547-7775**

7 *Jane Doe's teacher at Robert Vela High School.*

8 **Jesus Angel Sanchez**
9 **c/o Esparza & Garza, L.L.P.**
10 **964 E. Los Ebanos**
11 **Brownsville, Texas 78520**
12 **(956) 547-7775**

13 *Robert Vela High School custodian.*

14 **Edinburg Consolidated Independent School District Police Department**
15 **1313 E. Schunior Street**
16 **Edinburg, Texas 78541**
17 **(956) 289-2572**

18 **Det. Sgt. Maria Y. Sepulveda**
19 **c/o Edinburg CISD Police Department**
20 **1313 E. Schunior Street**
21 **Edinburg, Texas 78541**
22 **(956) 289-2572**

23 *Edinburg CISD Police Investigator at the time of the incident(s).*

24 **Officer Belinda Anzaldua**
25 **c/o Esparza & Garza, L.L.P.**
26 **964 E. Los Ebanos**
27 **Brownsville, Texas 78520**
28 **(956) 547-7775**

Robert Vela High School campus police officer at the time of the incident(s).

Sally Pena
c/o Safe Haven Forensic Exam Center at Renaissance
5501 South McColl Road
Edinburg, Texas 78539
(956) 655-4727

SANE nurse who examined Jane Doe after the incident.

**The Children's Assessment Center
2500 Bolsover
Houston, Texas 77005
(713) 986-3300**

Plaintiff's medical provider.

**Edinburg Children's Hospital
1102 W Trenton Road
Edinburg, Texas 78539
(956) 388-6800**

Plaintiff's medical provider.

Plaintiff's expert witnesses

Defendant's expert witnesses

B. Relevant Documents & Tangible Things

2. **Such documents will be produced.**

C. Information Related to Calculation of Damages

3. **Medical damages, past and future, will be based on the opinions of Plaintiff's treating doctors. Mental anguish, past and future, and pain and suffering, past and future, will be subject to the discretion of the jury. Plaintiff also seeks punitive damages. Discovery is ongoing and Plaintiff reserves the right to supplement.**

D. Insurance

4. **Not applicable.**

II. DISCLOSURE OF EXPERT TESTIMONY:

A. Identity of any person who may be used at trial to present evidence under rules 702, 703, or 705 of the Federal Rules of Evidence.

At present, Plaintiff has not made a determination as to who, if anyone, she may call to testify as an expert. Additionally, Plaintiff reserves the right to call as an expert witness any person identified by Plaintiff or Defendant as an expert, either in Plaintiff's or Defendant's disclosures, or in Plaintiff's or Defendant's Answers to Interrogatories.

1 Dated: December 2, 2019

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3 Respectfully Submitted,

4 **THE BUZBEE LAW FIRM**

5 By: /s/ Cornelia Brandfield-Harvey
6 Anthony G. Buzbee
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17 Telephone: (713) 223-5393
18 Facsimile: (713) 223-5909

19 **ATTORNEYS FOR PLAINTIFF**

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21 **CERTIFICATE OF SERVICE**

22 I hereby certify that a true and correct copy of this document has been duly served on all
23 known counsel of record and pro se parties in accordance with the Federal Rules of Civil
24 Procedure on *December 2, 2019*.

25 /s/ Cornelia Brandfield-Harvey
26 Cornelia Brandfield-Harvey
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